

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Movant-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TRUE THE VOTE,

Movant-Intervenor.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

DECLARATION OF SHEILA J. KORTE

Pursuant to 28 U.S.C. § 1746, I, Sheila J. Korte, declare as follows:

1. My mother, Evelyn Brickner, is a resident of San Antonio, Texas and she is registered to vote in San Antonio, Texas. My mother is ninety-six years old. Because she did not have one of the IDs required to vote under the new Texas voter ID law, I tried to help her get a Texas state identification. As explained below, despite my efforts, I was unable to get her one before the November 5, 2013 election.
2. The first time I took my mother to a Department of Public Safety (DPS) office was on Friday, October 18, 2013. We went after going to the hair salon, because my mother wanted to make sure her hair looked nice for her picture. We brought numerous forms of identification with us to DPS, including my mother's unexpired Ohio driver's license, her Social Security card, her Texas voter registration card, her Medicare identification card, her credit cards, and a letter from her condo association stating she has lived there for two years.
3. We presented the documents to a DPS worker. The woman said that none of the documents we brought qualified as proof of citizenship. She said we needed to bring a certified copy of my mother's birth certificate to get an ID.
4. I argued with the DPS worker a bit and said to look at how much stuff my mother already had. The DPS worker said no, they could not accept any of those, and that we must get a certified copy of my mother's birth certificate.
5. I went home and called Putnam County, Ohio, the county where my mother was born. The county said they would send us a certified copy of her birth certificate, which they did. I had to pay \$5 to get this certificate.
6. I took my mother to the DPS office a second time on Monday, October 28, 2013. A different DPS worker looked at the certified copy of my mother's birth certificate that we brought with us and pointed out that the name on the birth certificate was not the same as my mother's current legal name. I said of course they were not the same, my mother was married. The DPS worker said my mother needed a copy of her marriage license, showing the name change, to get a state ID.
7. My mother was married in 1936 and she does not have a copy of her marriage license.

8. When we went home, I called Auglaize County, Ohio where my mother and father were married. The county checked their records five years before my parents' wedding date (August 8, 1936) and five years after their wedding date, but they could not find their marriage license. If they had found their marriage license, the cost to obtain a certified copy would have been \$3.
9. My sister and I believe my mother needs a legal form of ID. We finally realized it will be easier to get my mother a U.S. passport, so we are now planning to try and do that. But we did not realize it would be easier to get a passport until just before the election.
10. My mother has not voted previously in Texas. But she is a member of the American Legion and she went to a party this year where she got all excited about voting.
11. I was going to take my mother to try to vote on November 5, 2013 to see if they would actually turn her away. But my mother told me she did not want to go. She is in a wheelchair and has a lot of difficulty getting around, and she said it would be too embarrassing with her physical difficulties and the lack of ID issue. When the DPS workers had previously turned her down for an ID, she was embarrassed and did not want me to make a stink about the issue when they did. She also did not want to be embarrassed and for me to make a stink at the polling place about letting her vote.
12. Before trying to help my mother get an ID, I thought the controversy around the voter identification law was much ado about nothing. I thought it was not going to be a big deal to get an ID. It has been far worse than I thought it could be to try to get my mother an ID in order for her to vote.
13. It is hard for my mother to travel much. At 96, even in riding in a nice car is not very comfortable. She and I went through a lot of effort, including two trips to the DPS office, to try to get her an ID but we were unsuccessful. I believe the law imposes an incredible burden on my mother's right to vote.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on this 15 day of NOVEMBER, 2013.



Sheila J. Korte